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January 15, 2020

BY ECF

The Honorable Robert M. Levy
United States Magistrate Judge
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Adriana Guzman v. City of New York, et al.*, 18 CV 5206 (ENV) (RML)

Dear Magistrate Judge Levy:

I represent the plaintiff in the above-referenced civil rights action. I write jointly with defense counsel to request a ninety-day enlargement of time to complete discovery from January 15, 2020 to April 15, 2020, and an adjournment of the telephone conference currently scheduled for January 27, 2020, at 3:00 p.m., to a date and time convenient to the Court.

The reason for these requests is that although the parties have been working cooperatively to complete discovery, additional time is required to resolve some paper discovery issues before commencing depositions. Further, Mr. Zapert was recently assigned to this case, and the parties have mutually expressed an interest in pursuing settlement discussions.

Thank you for your consideration.

Respectfully,

Brett Klein

Brett H. Klein

cc: Brian Zapert, Esq.